

BASF Corporation

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May 9, 2005

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The Honorable Stephen Johnson, Administrator
U. S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Subject: Chemical Right-to-Know – Response to Comments

Dear Administrator Johnson:

On 15 March 2005, the U.S. Environmental Protection Agency (EPA) posted its comments on the robust summaries and test plan for Oxidized Cyclohexane, aqueous extract (CAS No. 68915-38-8) submitted to the Agency by BASF Corporation (BC) under the Chemical Right-to-Know High Production Volume (HPV) Challenge program in December 2003.

BC recognizes the desire of the Agency to have adequate hazard screening data for each Screening Information Data Set (SIDS) Level I endpoint or a recognized exemption from such testing. BC has reviewed the Agency comments and believes these desires can be achieved by providing (a) a more thorough documentation of the isolated chemical intermediate status of the oxidized cyclohexane extract, (b) a more detailed chemical analysis of its ester components, and (c) a more thorough description of the known hazards posed by the extract and / or its major components. BC expects to provide the Agency with a revised test plan and robust summaries incorporating the new information by the end of 2005.

If you have any questions, please contact me via the information below.

Sincerely,

BASF CORPORATION

/S/

Ralph J. Parod, Ph.D., D.A.B.T.
HPV Program Technical Contact
Tel: 734-324-6212
E-Mail: parodr@basf.com

cc: O. Hernandez, U. S. EPA
H. Perryman, BC
S. Russell, American Chemistry Council